

1 Q. And on this copy it has an Exhibit C
2 designation at the bottom in the middle.

3 A. "C", I don't see any "C".

4 Q. I think if you flip to the page before the one
5 you're looking at --

6 A. Oh, okay, got it.

7 Q. The document that has the title Quit-Claim
8 Deed, it's numbered -- the Spencer page number in the
9 bottom right corner, 006060, do you see that?

10 A. Correct.

11 Q. That wasn't one of the two pages you brought
12 with you today, was it?

13 A. No.

14 Q. But you have seen that title page to the
15 Quit-Claim Deed?

16 A. The one you're talking about now?

17 Q. Yeah, the one that has the words Quit-Claim
18 Deed.

19 A. No.

20 Q. Okay. You've not seen that one?

21 A. No.

22 Q. Let's turn to the next page in Exhibit 3, it's
23 numbered in the bottom right, Spencer 006061. Have you
24 ever seen that document before?

25 A. No.

1 Q. Okay. Let's turn to the next page, it's
2 numbered in the bottom right corner, Spencer 006062.

3 A. Yes.

4 Q. Is that one of the pages that Mr. Henderson
5 showed you at the meeting?

6 A. Yes.

7 Q. Okay. And then I think the page behind that,
8 which is numbered in the right corner, 006063, that's
9 the other page that you brought a copy of today,
10 correct?

11 A. Yes.

12 Q. Did Mr. Henderson leave you the copy of those
13 two pages from that first meeting you had with him?

14 A. Yes.

15 Q. Okay. Let's look at the page with the notary
16 section at the bottom that has your name on it, that's
17 numbered Spencer 006062, okay?

18 A. Okay.

19 Q. Is it your testimony that your name where it
20 appears twice on this document in the notary section, is
21 it your testimony that that is not your signature?

22 A. Yes.

23 Q. Okay. And how do you know it's not your
24 signature?

25 A. The "E" down below looks like an "O", it's

1 under the line, every signature I've ever done has been
2 on the line or above. The "D" is not the same as I sign
3 any paper.

4 Q. Okay. Anything else?

5 A. I don't know why the 15 is written in instead
6 of typed in.

7 Q. Did you always type in a date the day when you
8 notarized a document?

9 A. Yes.

10 Q. Okay. Anything else that you base that
11 testimony on that this is not your signature?

12 A. No.

13 Q. And when you said the "E" is below the line,
14 your name it looks like actually is written in twice in
15 this notary block, do you see that? The top section
16 where it says I, and then the name appears Menona D.
17 Landrum, that appears to have been written, doesn't it?

18 A. Yes.

19 Q. That "E" is above the line, correct?

20 A. Correct.

21 Q. So when you said the "E" being below the line,
22 you're talking about the actual signature?

23 A. Yes.

24 Q. And when you said the "D" is not the same as
25 you put it on any paper, are you referring to both "Ds",

1 both middle initials?

2 A. They're incorrect.

3 Q. Okay. And both of them are?

4 A. Yes.

5 Q. Okay. And there's nothing about the way
6 Landrum appears in either place that causes you to
7 conclude that that's not your signature?

8 A. No.

9 Q. Okay. I want to back up and go back to the
10 meeting, the first meeting you had with Mr. Henderson at
11 your house he showed you the two pages that we've
12 identified?

13 A. Yes.

14 Q. What did he tell you? You said he said they
15 believed the signature was forged, whose signature did
16 he tell you he believed was forged?

17 A. Mine.

18 Q. Okay. Did he tell you anything about whether
19 he or the attorneys he was working for believed that
20 Mr. Spencer's signature was forged?

21 A. No.

22 Q. Okay. Did he tell you why they believed your
23 signature had been forged?

24 A. No.

25 Q. And you didn't ask?

Objection -
hearsay

Response -
not offered
for truth of
statement, it
is relevant
to the
witness being
influenced by
her
interviewer

1 A. No.

2 Q. Okay. I think you mentioned, when you said how
3 you first became aware, that there was going to be a
4 program about Mr. Spencer from the article in The
5 Columbian, and it sounded like what you understood from
6 the article was that he had been falsely prosecuted or
7 accused?

8 A. Yes.

9 Q. Did you form an opinion based upon what you
10 read, the first time you read about that, in the local
11 newspaper as to whether he had been actually falsely
12 accused?

13 A. Did I form an opinion?

14 Q. Right.

15 A. No.

16 Q. How about after you watched the 20/20 program,
17 did you have a belief as to whether he had been falsely
18 accused after you saw that program?

19 A. Yes.

20 Q. What was your belief or opinion?

21 A. That he had been falsely arrested, falsely
22 prosecuted.

23 Q. Okay. Between the time you saw the 20/20
24 program and when Mr. Henderson called you, had you
25 talked to anybody about Mr. Spencer's case?

1 A. No.

2 Q. And I think you just said Mr. Henderson didn't
3 tell you anything about why they believed your signature
4 had been forged?

5 A. Not that I recall.

6 Q. Would you agree with me that based on you
7 having seen that 20/20 program and formed an opinion, in
8 your own mind, that Mr. Spencer had been falsely accused
9 and falsely prosecuted, that that probably influenced
10 how you received the information from Mr. Henderson that
11 your signature may have been forged on this document?

12 A. No.

13 Q. And why do you think that didn't?

14 A. I don't know, why would I have an opinion, and
15 that's my privilege.

16 Q. During all of the years that you worked for the
17 Clark County Sheriff's Office, were you ever aware of
18 the situation where a document that bore your notary
19 signature had been forged?

20 A. Not to my knowledge.

21 Q. Okay. If you would look at Exhibit 2, which is
22 the copy of your declaration.

23 (Witness complied.)

24 Q. In paragraph five at the bottom of the first
25 page, the second sentence says, "I have no memory of

1 being called up to the jail to notarize the signature of
2 an inmate on a quit-claim deed or any other type of
3 document." Did I read that accurately?

4 A. Uh-huh.

5 Q. For the record, that's yes?

6 A. Yes.

7 Q. Is it possible you may have gone up to the jail
8 and notarized a document for an inmate and you just
9 don't recall it?

10 A. No.

11 Q. You're absolutely certain you never did go to
12 the jail and notarized a document?

13 A. Right.

14 Q. Okay. And then paragraph six on the next page,
15 the sentence reads, "To my knowledge, I have never met
16 Mr. Spencer or ever seen him in person." Did I read
17 that accurately?

18 A. Right.

19 Q. Is it possible you may have met Mr. Spencer or
20 seen him at some point during the few months he was
21 incarcerated in the Clark County Jail and you simply
22 don't remember it?

23 A. No.

24 Q. And why are you certain that that's not
25 possible?

1 A. Never happened.

2 Q. Okay. Do you know what Mr. Spencer looked like
3 back in 1985?

4 A. No.

5 Q. And I'm wondering then how you can be so
6 certain that you never laid eyes on Mr. Spencer, if you
7 wouldn't have even known what he looked like?

8 MS. ZELLNER: You're talking about when he's in
9 jail?

10 MR. BOGDANOVICH: Right, during 1985.

11 THE WITNESS: I didn't see him, I never saw
12 inmates.

13 BY MR. BOGDANOVICH:

14 Q. Is it your testimony that you never notarized
15 any document for any inmate during the whole time you
16 worked for the sheriff's office?

17 A. That's right.

18 Q. Okay. And the other clerk, the jail clerk, you
19 said she was a notary?

20 A. Uh-huh.

21 Q. Do you know whether she ever notarized any
22 documents for inmates?

23 A. I have no idea.

24 Q. Paragraph four of your declaration, it's on the
25 first page, this is Exhibit 2, you say, "Throughout the

1 years that I was with the sheriff's office, I kept my
2 notary seal in a drawer of my desk. For a period of
3 time, I locked the drawer before leaving the office at
4 the end of the day. When I arrived at work one morning,
5 I discovered that someone had pried open the drawer
6 during the night. The seal was still there and nothing
7 else appeared to be missing. When I realized how easily
8 the drawer could be forced open, I saw no purpose in
9 continuing to keep it locked overnight." Did I read
10 that accurately?

11 A. Correct.

12 Q. Can you tell me when that incident occurred,
13 when you arrived at work and discovered that your drawer
14 had been pried opened during the night?

15 A. No.

16 Q. Can you say whether it was sometime in the '70s
17 as opposed to the '80s?

18 A. No.

19 Q. Can you say whether it was before or after
20 1985?

21 A. No.

22 Q. And it sounded like from the way you were
23 describing the layout of the area where you worked, the
24 public could walk in and could have access to your desk?

25 MS. ZELLNER: Objection, you're confusing the

1 locations and time. You've got the layout before they
2 moved to the new building, you've got the old layout.

3 BY MR. BOGDANOVICH:

4 Q. Well, let me ask you Ms. Landrum, we talked
5 about the jail moved from the fifth floor of the
6 courthouse to across the street.

7 A. Yes.

8 Q. Did your office also relocate to the same
9 building where the jail moved to?

10 A. Yes.

11 Q. Okay. And once that move occurred -- and you
12 said that was in April of 1985?

13 A. ~~Correct.~~ *Errata: Incorrect, it was April 1984.*

14 Q. Where was your work station located in the new
15 building?

16 A. On the ground floor.

17 Q. And where was the jail?

18 A. I believe there's a walkway between our
19 building and the jail.

20 Q. Okay. When you say "walkway," can you -- I
21 mean, was the jail also on the ground floor?

22 A. No, there's two or three floors, I believe.

23 Q. To the jail?

24 A. To the jail.

25 Q. Were they both above the ground floor where

1 your work station was?

2 A. Yes.

3 Q. Do you happen to remember the address for your
4 office?

5 A. No, I don't.

6 Q. Okay. Were there any other offices that
7 occupied a floor or more than one floor between your
8 ground floor work station and whatever floors were
9 occupied by the jail?

10 A. No.

11 Q. So the jail was immediately above your ground
12 floor?

13 A. Right.

14 Q. Did this overnight break-in to your desk
15 drawer, did that occur, if you know, before or after you
16 moved to this new location?

17 A. Before.

18 Q. Okay. Did you make any report of this prying
19 open of your desk drawer overnight?

20 A. No.

21 Q. Why didn't you?

22 A. It was a prank.

23 Q. Why do you say it was a prank?

24 A. One of the fellow people was a prankster, the
25 desk drawer was right open.

1 Q. Who was the prankster you're referring to?

2 A. I cannot reveal that.

3 Q. Why not?

4 A. I'm not going to involve him.

5 Q. Well, I'm going to ask you, please, to identify
6 who the individual is. I mean, we're in the middle of a
7 civil lawsuit with some significant claims and issues
8 and, you know, you are obligated to respond truthfully
9 and accurately with questions that we ask you today. So
10 I would ask you to, please, identify the individual you
11 referred to as the prankster.

12 A. His name is Harold Teters.

13 Q. Okay. And what was Mr. Teters' position, was
14 he an employee of the sheriff's office?

15 A. He was a deputy sheriff, served civil papers.

16 Q. Did you ever confirm with Mr. Teters that he
17 was the one that had pried open your desk drawer?

18 A. Oh, he joked about it.

19 Q. Did he tell you why he had done it?

20 A. No.

21 Q. You said the seal was still there and that you
22 had to have the seal that you would place on papers that
23 you notarized, correct?

24 A. Yes.

25 Q. And that's the seal you're referring to that

Objection -
attorney
instructing
the witness;
not a
question
Response -
needed to
fairly
explain the
need to
overcome the
witness'
reluctance
to answer

1 was still there?

2 A. Yes.

3 Q. Did anything else appear to be missing from
4 your drawer that morning you discovered it had been
5 pried open?

6 A. No.

7 Q. Did you ever ask Deputy Teters specifically why
8 he pried your drawer open?

9 A. No.

10 Q. It was your impression that he did it because
11 that was kind of his nature?

12 A. Right.

13 Q. Can you give me examples of any other practical
14 jokes he had pulled around the office?

15 A. He put paper clips together and strung them all
16 over the top of my desk.

17 Q. Anything else?

18 A. No.

19 Q. All right. I want to go back and ask you once
20 you moved into the new location that you occupied in the
21 new building across the street, when the jail and your
22 office moved in April of 1985, can you describe what the
23 configuration was of your work area? 1984 (per errata sheet)

24 A. It was just a big room full of desks.

25 Q. Okay. Were there still three desks or were

1 there more?

2 A. Well, I know the warrant clerk had a desk in
3 there, I'm sure there were more than one or two desks,
4 but it was just a big room.

5 Q. So in that respect, it was a similar layout to
6 the previous office space you had occupied?

7 A. Right.

8 Q. And was your desk accessible by members of the
9 public entering the civil division?

10 A. Correct, we had a window we could open and
11 close, opened at eight o'clock in the morning and closed
12 at five o'clock at night to the public.

13 Q. Where was the window situated in relation to
14 your desk?

15 A. Right in front of my desk, like I'm sitting
16 here (indicating) and there's that window.

17 Q. Okay. Was the window somehow attached to your
18 desk?

19 A. No.

20 Q. Was it at like a greeting counter of some sort?

21 A. Yeah, there was a counter where you waited on
22 the public.

23 Q. Okay. Could the public walk around the counter
24 to get back into the area where your desk was?

25 A. They could, but they didn't, there's a door.

1 Q. Was the door kept locked?

2 A. No.

3 Q. Was there always a sheriff's office employee
4 stationed at that front reception desk or did they
5 just --

6 A. No.

7 Q. Go ahead.

8 A. Not stationed at that window.

9 Q. Was part of your job responsibility to get up
10 and address members of the public that would come in?

11 A. My desk was close enough that I could sit at it
12 and talk to the people standing facing me.

13 Q. Was that part of your job duties?

14 A. Yes.

15 Q. To respond to members of the public that came
16 to that desk and window?

17 A. Correct.

18 Q. Okay. And I get the impression from the way
19 you've described this incident where Deputy Teters pried
20 open your desk drawer, it doesn't sound to me like you
21 had any concern at that point that somebody had secretly
22 misused your notary instrument?

23 A. Not to my knowledge.

24 Q. Did you ever have reason to suspect anytime
25 that you worked at the sheriff's office that someone had

1 improperly taken your notary equipment and used them?

2 A. No.

3 Q. During the entire time that you worked there,
4 were you ever made aware of any circumstances in which
5 Sharon Krause was accused of forging any documents?

6 A. No.

7 Q. How about Michael Davidson, were you ever aware
8 of any situation where he was accused of forging any
9 documents?

10 A. No.

11 Q. Have you talked to Sharon Krause at anytime
12 since you left the employment of the sheriff's office?

13 A. No.

14 Q. I want to go back to the first meeting that you
15 had with Mr. Henderson at your house. You said he told
16 you about his belief that your signature had been forged
17 on one page of the two that he showed you, what happened
18 after that?

19 A. We just had a discussion about the case and my
20 job.

21 Q. Okay. Can you tell me anything specifically
22 that you discussed about that?

23 A. No.

24 Q. Did Mr. Henderson tell you any other details
25 about the case?

Objection -
question
includes
hearsay; if
prior
objection is
sustained,
assumes
facts not in
evidence

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A. No.

Q. He didn't describe what Mr. Spencer's
allegations are against Sharon Krause or Michael
Davidson or James Peters?

A. Yes.

Q. What did he tell you?

A. That that Quit-Claim Deed had been forged.

Q. And I asked you previously whose signature he
believed had been forged and you said he told you they
thought yours had been forged?

A. Right.

Q. But I think you said he didn't say anything
about their believing that Mr. Spencer's signature was
forged?

A. No.

Q. Okay. Anything else that he told you about the
case or Mr. Spencer's claims against the people he's
suing?

A. No.

Q. He didn't describe anything about a conspiracy
among Sharon Krause and Michael Davidson and James
Peters to falsely accuse or frame Mr. Spencer?

A. No.

Q. Had you picked that up from the 20/20 program?

A. Yes.

Objection -
calls for
hearsay

1 Q. And based on your viewing of the 20/20 program,
2 it sounds like you had formed an opinion that it did in
3 fact happen?

4 A. Yes.

5 Q. And was that opinion based on anything other
6 than what you saw on the 20/20 program and what you had
7 read previous to that in The Columbian?

8 A. No.

9 Q. Did Mr. Henderson type up this declaration
10 while he was at that first meeting at your house?

11 A. No.

12 Q. Okay. Is there anything else you recall about
13 what was discussed between you and Mr. Henderson at that
14 first meeting, other than what you've told us?

Objection -
calls for
hearsay

15 A. No.

16 Q. Okay. When Mr. Henderson left your house at
17 the end of that first meeting, did you have some
18 understanding or agreement of what was going to happen
19 next, if anything?

20 A. Well, he was going to write this declaration,
21 that's all I know.

22 Q. Okay. After he left your residence, what was
23 the next communication you had with Mr. Henderson?

24 A. On the 24th when I signed the declaration.

25 Q. Did he come back to your house?

1 A. He came back to my house.

2 Q. He had this declaration with him at that point?

3 A. Correct.

4 Q. Did you sign it exactly as he brought it back
5 to you?

6 A. Yes.

7 Q. Did Mr. Henderson tape record any part of the
8 conversation he had with you when he was at your house
9 the first time?

10 A. No.

11 Q. Was he taking notes that you could see?

12 A. Yes.

13 Q. Did Mr. Henderson bring anybody with him when
14 he came to your house the second time?

15 A. No.

16 Q. I think you said he was alone the first time as
17 well?

18 A. Right.

19 Q. Did he bring anything with him other than this
20 declaration at the second meeting?

21 A. No.

22 Q. How long did the first meeting last the first
23 time he came to your house?

24 A. Thirty minutes, but we talked about other
25 things other than this case.

Objection -
calls for
hearsay

1 Q. Okay. And I've asked you a few times to tell
2 me as best you recall any specifics about what you
3 discussed with Mr. Henderson about the case. I mean, is
4 there anything else that comes to mind now, that you
5 haven't testified to already?

6 A. No.

7 Q. How long was Mr. Henderson at your house the
8 second time when he brought this declaration?

9 A. Probably 30 minutes, 45 minutes.

10 Q. What happened during that 30 or 45 minutes?

11 A. We went over the declaration.

12 Q. Did you have any questions for Mr. Henderson
13 about any of the wording in the declaration?

14 A. No.

15 Q. So I'm wondering why you would have taken 30 or
16 45 minutes, if you had no questions about the
17 declaration.

18 A. We talked about my husband's illness, we talked
19 about personal things, it had nothing to do with the
20 case.

21 Q. Can you tell me how long you think you actually
22 talked about your declaration or the case with
23 Mr. Henderson the second time he came to your house?

24 A. No.

25 Q. Okay. Have you talked to Mr. Henderson since

1 he left your house from that second meeting he had with
2 you?

3 A. Yes.

4 Q. And when was that?

5 A. On the telephone.

6 Q. Did he call you or did you call him?

7 A. I think he called me and said there would
8 probably be a deposition.

9 Q. Did he tell you who would be taking the
10 deposition?

11 A. The attorneys for the defendants.

12 Q. Okay. Did he tell you anything else?

13 A. No.

14 Q. How long did that telephone conversation last?

15 A. Five minutes.

16 Q. Did you talk about anything other than the fact
17 that there would probably be a deposition?

18 A. No.

19 Q. Did he give you the names of any people who
20 would be involved in the probable deposition?

21 A. No.

22 Q. Did you have any questions for Mr. Henderson
23 about the deposition he was telling you about, what that
24 would entail, who would be present, anything of that
25 nature?

1 A. No.

2 Q. Did you know what a deposition was when he
3 mentioned that?

4 A. Vaguely.

5 Q. Any other communications you've had with
6 Mr. Henderson?

7 A. No.

8 Q. And I think when I asked you at the start of
9 your deposition who you've talked to or communicated
10 with about this case you mentioned Mr. Henderson and
11 Ms. Zellner?

12 A. Yes.

13 Q. Tell me what communications you've had with
14 Ms. Zellner.

15 A. Wait a minute, I haven't had any communications
16 with her until today.

17 Q. And what communication did you have with
18 Ms. Zellner today?

19 A. We went over the deposition process.

20 Q. Can you tell me specifically what you went
21 over, what was said?

22 A. No.

23 Q. You don't recall?

24 A. We talked about what the questions would be.

25 Q. Did Ms. Zellner tell you what she thought the

1 questions would be?

2 A. Some, yes.

3 Q. What did she tell you?

4 A. To answer them honestly.

5 Q. Did she tell you what the questions were going
6 to be that she was anticipating?

7 A. Yes.

8 Q. Well, that's my question to you now, what
9 questions did she say she thought we would be asking
10 you?

11 A. I can't say word for word verbatim what the
12 questions were.

13 Q. Do you remember anything about that meeting
14 this morning and what she thought the questions would
15 be?

16 A. No, I don't.

17 Q. Okay. Have you ever talked to Mr. Johnson?

18 A. Not until today.

19 Q. Okay. Was he present at the meeting you had
20 with Ms. Zellner?

21 A. Yes.

22 Q. Did Mr. Johnson speak at the meeting or did
23 Ms. Zellner do all the talking?

24 A. She did the talking.

25 Q. Is there anybody else that has communicated

1 with you on behalf of Mr. Spencer, other than
2 Mr. Henderson and Ms. Zellner?

3 A. No.

4 MR. BOGDANOVICH: I have one more group of
5 documents for you to mark.

6 (Deposition Exhibit No. 4 marked for
7 identification.)

8 MR. BOGDANOVICH: I'm just about through, the
9 other attorneys may have some questions. Let's take a
10 break and go off the record.

11 (Off the record discussion.)

12 BY MR. BOGDANOVICH:

13 Q. Ms. Landrum, I'm handing you what's been marked
14 as Exhibit 4 to your deposition. I'm going to ask you
15 to take a look at that, and on this one because there
16 are quite a few pages, I want to give you a general
17 description that what I've handed you -- and I'll ask
18 you about a couple specific things in a second. But
19 what I've handed you is a copy of a subpoena in a civil
20 case that I served on behalf of Sharon Krause on the
21 Clark County Sheriff's Office records custodian. And
22 one of the categories of documents we asked them to
23 produce were any that bear your signature dated between
24 January 1st, 1985 and December 31st, 1991.

25 A. Uh-huh.

Plaintiff
objects to
the
admission of
Deposition
Exhibit No.
4 and all
questions
related
thereto; the
foundation
for these
documents
has not been
properly
laid by the
witness;
also, the
questions
essentially
seek
testimony in
the form of
expert
opinions
regarding
handwriting,
and
Defendants
have
disclosed no
handwriting
expert
Response - Plaintiff
waved the foundation
objection - see FRCP
32(d)(3). The
exhibit is also
self-authenticating.
No expert testimony
is needed, the
witness is
describing her own
observations of her
own handwriting.
This exhibit and
testimony are the
only way defendants
have to examine her
on these issues.

Objection -
see p. 53
Response -
see p. 53

1 Q. So behind the copy of the subpoena are copies
2 of all of the documents that the Clark County Sheriff's
3 Office records custodian produced in response to that
4 subpoena, so I just wanted to give you that by way of
5 background.

6 A. Okay.

7 Q. You're free to review them in any detail you
8 would like at this point. Our interest in them,
9 obviously, was wherever your signature appeared, and
10 that's what my couple of questions will pertain to.

11 A. That's my nickname.

12 Q. Apparently you were known by Nonie?

13 A. Yes, in fact, one of my civil deputies called
14 me "Noe Noe."

15 (Witness complied.)

16 A. Okay.

17 Q. All right. You've had a chance to look over
18 these documents and, like I said, with my description I
19 don't necessarily expect you to remember each entry on
20 each document. But what I would like to do is direct
21 you to the second to the last page of the document
22 stapled together as Exhibit 4, it's entitled -- at the
23 top it looks like Notice of Intent to Participate in
24 Incentive Program, do you see that?

25 A. Uh-huh.

1 Q. Does that appear to you to be your signature
2 down toward the bottom right-hand side?

3 A. Uh-huh.

4 Q. Dated February 1st, 1988; is that correct? Do
5 you see the date just to the left of your signature?

6 A. Yes.

7 Q. Okay. And do you see the "E" in Menona?

8 A. Uh-huh.

9 Q. It does appear partly below the line, correct?

10 A. Very little.

11 Q. And having reviewed these documents now, I
12 think the only other reason you testified to in support
13 of your belief that your signature on the Quit-Claim
14 Deed was forged by someone, is that the two "Ds" look
15 different than you signed your "Ds".

16 A. The "Es" -- oh, the "Ds".

17 Q. Yeah, the "Ds", yeah, your middle initial.
18 What's your middle name?

19 A. Dawn.

20 Q. Dawn. And that was you said the "E" below the
21 line and the two "Ds" looked different. Those were the
22 only two reasons you gave in support of your belief that
23 your Quit-Claim Deed signatures were forged, correct?

24 A. Right.

25 Q. Okay. What is it about the "Ds"?

Objection -
see p. 53.

See response
p. 53

Objection -
misstates
her
testimony;
previously
testified
that she had
never
notarized
any document
for an
inmate

Response -
accurate
question

1 MS. ZELLNER: Just a minute, I want to object
2 to that question. She gave reasons why the actual
3 signature to her indicates a forgery, but she gave you
4 other reasons, she had never notarized an inmate.

5 MR. FREIMUND: Well, Kathy, make an objection,
6 but come on, let's not play these games.

7 MS. ZELLNER: It's not a game, he's -- I'll
8 make the objection, he's mischaracterizing her entire
9 testimony.

10 MR. BOGDANOVICH: Okay. And she's entitled to
11 object.

12 BY MR. BOGDANOVICH:

13 Q. But my question to you is: Have you seen
14 anything in these other signatures we see of yours in
15 Exhibit 4 that supports your statement about the "Ds" on
16 the Quit-Claim Deed being different than the way you
17 signed them?

18 A. Yes, the "D", my "Ds" normally went down like
19 this (indicating).

20 Q. Okay. Let's get --

21 A. Those go underneath, they're not all the same.

22 Q. Before you get to the comment you just made,
23 could you tell us which document by title in Exhibit 4,
24 there are titles at the top of the documents.

25 A. Oh, okay, Health Enrollment Application.

Objection -
see p. 53.
See response
p. 53